

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WESTERN SECTION
CIVIL ACTION
NO. 05-30199-MAP

<u>ADELHEID TEUTSCH,</u>)
Plaintiff)
)
v.)
)
<u>KARL G. COOPER, JR., et al.,</u>)
Defendants)

JOINT STATEMENT

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1 of the Local Rules of the United States District Court for the District of Massachusetts, counsel of record have conferred and state as follows:

1. Joint Discovery Plan and Motion Schedule:

The parties propose the following pretrial schedule:

- (a) The parties shall complete their automatic disclosure on or before March 1, 2006.
- (b) All written discovery shall be served by May 31, 2006.
- (c) Non-expert depositions shall be completed by December 31, 2006.
- (d) The plaintiff shall designate and disclose information regarding her trial experts as required by Fed. R. Civ. P. 26(a)(2) by February 28, 2007.
- (e) The defendants shall designate and disclose information regarding their trial experts as required by Fed. R. Civ. P. 26(a)(2) by March 30, 2007.
- (f) All expert depositions shall be completed by May 31, 2007.
- (g) Motions for summary judgment are to be filed by July 31, 2007 and responses are to be filed twenty days thereafter pursuant to Local Rule 7.1, and all filings must conform to the requirements of L.R. 56.1.

2. Certifications regarding each party's consultation with counsel regarding budgets and alternative dispute resolution will be filed separately with the Court.
3. The parties have not agreed to proceed before a Magistrate Judge of this Court.
4. The parties will consider the desirability of conducting phased discovery in which the first phase is limited to developing information needed for a realistic assessment of the case, and if the case does not terminate, the second phase is directed at information needed to prepare for trial.
5. The plaintiff has submitted a settlement proposal to counsel for the defendants, and has offered to submit this case to mediation in an effort to resolve this case prior to engaging in protracted litigation.

DATED: January 17, 2006

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By Her Attorneys,

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